

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, INC.,	:	x
	:	
Plaintiff,	:	
	:	
-vs-	:	Civil Action No: 07-cv-6488
	:	(LTS)(KNF)
CITY HALL RECORDS, INC. and ROBIN	:	
COHN,	:	
	:	<b>PROPOSED CASE MANAGEMENT</b>
Defendants.	:	<b>PLAN</b>
	:	
	:	x

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The parties, having conferred, respectfully submit this Proposed Civil Case Management Plan in accordance with Rule 26(f), and request that it be adopted as the Scheduling Order of this Court.

**1. Magistrate Judge Jurisdiction**

The parties do not consent, at this time, to conducting all further proceedings before a Magistrate Judge.

**2. Jury Trial**

The parties do not consent, at this time, to waive a jury trial.

**3. Deadline to Amend Pleadings and Join Additional parties**

The parties stipulate that the deadline to amend pleadings and join additional parties shall be June 1, 2008.

**4. Protective Order**

The parties agree that a Protective Order will be necessary in this case in order to preserve confidential business information exchanged during the course of the litigation. The parties submit for the Court's consideration the attached proposed Protective Order.

**5. Initial Disclosures**

Initial disclosures shall be served on or before February 1, 2008.

**6. Fact Discovery Deadline**

The parties stipulate that all fact discovery, including depositions, shall be completed by October 31, 2008.

**7. Expert Discovery**

The parties stipulate that expert reports shall be exchanged by November 30, 2008, and expert discovery shall be completed by January 12, 2009.

**8. Dispositive Motions**

The parties stipulate that dispositive motions shall be filed by February 27, 2009.

**9. Settlement**

The parties have discussed the possibility of settling this case. The prospects for settlement cannot be evaluated at this time.

**10. Alternate Dispute Resolution**

The parties agree that alternative dispute resolution is not necessary in this case.

**11. Length of Trial**

The parties anticipate that a trial of this case will take two to three days.

Dated: January 16, 2008

*Attorney for Plaintiff*

*Attorney for Defendants*

By: /s/ \_\_\_\_\_

By: /s/ \_\_\_\_\_

Matthew J. Oppenheim, Esq.

Jura C. Ziba

Joanne J. Romero

The Oppenheim Group  
7304 River Falls Drive  
Potomac, MD 20854  
301-299-4986  
866-766-1678 (fax)  
matt@oppenheimgroup.net

Lewis Brisbois Bisgaard & Smith LLP  
199 Water Street, 25th Floor  
New York, NY 10038  
(252) 232-1300  
(212) 232-1399(fax)  
zibas@lbbslaw.com